

10/01/2020

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for use of the Clerk of Court for the purpose of initiating the civil docket sheet.

PLAINTIFFS

CITGO Petroleum Corporation

DEFENDANTS

Ascot Underwriting Limited, Pioneer Underwriting Limited, MS Amlin Underwriting Limited, Travelers Syndicate Management Limited, Brit Syndicates Limited, Sompo International Insurance, Chaucer Syndicates Limited, Markel Syndicate Management Limited, Neon Underwriting Limited, and Starstone Insurance SE

ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

John Chamberlain, Pillsbury Winthrop Shaw Pittman LLP

1200 17th Street NW, Washington DC 20036

(202) 663.8000

ATTORNEYS (IF KNOWN)

Clyde & Co. US LLP

405 Lexington Ave., 16th Floor, New York, NY 10174

(212) 710.3900

CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE)
(DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Diversity jurisdiction pursuant to 28 U.S.C. § 1332(a)(2).

Has this action, case, or proceeding, or one essentially the same been previously filed in SDNY at any time? No Yes Judge Previously Assigned

If yes, was this case Vol. Invol. Dismissed. No Yes If yes, give date _____ & Case No. _____

IS THIS AN INTERNATIONAL ARBITRATION CASE?

No Yes

(PLACE AN [x] IN ONE BOX ONLY)

NATURE OF SUIT

		TORTS	ACTIONS UNDER STATUTES			
CONTRACT	PERSONAL INJURY	PERSONAL INJURY	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
[x] 110 INSURANCE	[] 310 AIRPLANE	[] 367 HEALTHCARE/PHARMACEUTICAL PERSONAL	[] 625 DRUG RELATED	[] 422 APPEAL	[] 375 FALSE CLAIMS	
[] 120 MARINE	[] 315 AIRPLANE PRODUCT	INJURY/PRODUCT LIABILITY	SEIZURE OF PROPERTY	28 USC 158	[] 376 QUI TAM	
[] 130 MILLER ACT	LIABILITY	[] 365 PERSONAL INJURY	21 USC 881	[] 423 WITHDRAWAL	[] 400 STATE	
[] 140 NEGOTIABLE INSTRUMENT	[] 320 ASSAULT, LIBEL & SLANDER	PRODUCT LIABILITY	[] 690 OTHER	28 USC 157	REAPPORTIONMENT	
[] 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT	[] 330 FEDERAL EMPLOYERS' LIABILITY	ASBESTOS PERSONAL INJURY PRODUCT LIABILITY	PROPERTY RIGHTS		[] 410 ANTITRUST	
[] 151 MEDICARE ACT	[] 340 MARINE		[] 820 COPYRIGHTS	[] 880 DEFEND TRADE SECRETS ACT	[] 430 BANKS & BANKING	
[] 152 RECOVERY OF DEFANTED STUDENT LOANS (EXCL VETERANS)	[] 345 MARINE PRODUCT LIABILITY		[] 830 PATENT		[] 450 COMMERCE	
	[] 350 MOTOR VEHICLE	[] 370 OTHER FRAUD	[] 835 PATENT-ABBREVIATED NEW DRUG APPLICATION		[] 460 DEPORTATION	
	[] 355 MOTOR VEHICLE	[] 371 TRUTH IN LENDING	[] 840 TRADEMARK		[] 470 RACKETEER INFLUENCED & CORRUPT ORGANIZATION ACT (RICO)	
[] 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS	PRODUCT LIABILITY			SOCIAL SECURITY	[] 480 CONSUMER CREDIT	
[] 160 STOCKHOLDERS SUITS		[] 360 OTHER PERSONAL INJURY	LABOR	[] 861 HIA (1395ff)	[] 485 TELEPHONE CONSUMER PROTECTION ACT	
[] 190 OTHER CONTRACT CONTRACT PRODUCT LIABILITY		[] 362 PERSONAL INJURY - MED MALPRACTICE	[] 710 FAIR LABOR STANDARDS ACT	[] 862 BLACK LUNG (923)		
[] 195 FRANCHISE	ACTIONS UNDER STATUTES		[] 720 LABOR/MGMT RELATIONS	[] 863 DIWC/DIWV (405(g))	[] 490 CABLE/SATELLITE TV	
	CIVIL RIGHTS		[] 740 RAILWAY LABOR ACT	[] 864 SSID TITLE XVI	[] 850 SECURITIES/COMMODITIES/EXCHANGE	
		[] 530 HABEAS CORPUS	[] 751 FAMILY MEDICAL LEAVE ACT (FMLA)	[] 865 RSI (405(g))	[] 890 OTHER STATUTORY ACTIONS	
		[] 535 DEATH PENALTY	[] 790 OTHER LABOR LITIGATION	FEDERAL TAX SUITS	[] 891 AGRICULTURAL ACTS	
		[] 540 MANDAMUS & OTHER	[] 791 EMPL RET INC SECURITY ACT (ERISA)	[] 870 TAXES (U.S. Plaintiff or Defendant)	[] 893 ENVIRONMENTAL MATTERS	
REAL PROPERTY				[] 871 IRS-THIRD PARTY	[] 895 FREEDOM OF INFORMATION ACT	
[] 210 LAND CONDEMNATION	[] 441 VOTING	PRISONER CIVIL RIGHTS	IMMIGRATION	26 USC 7609	[] 896 ARBITRATION	
[] 220 FORECLOSURE	[] 442 EMPLOYMENT		[] 462 NATURALIZATION		[] 899 ADMINISTRATIVE PROCEDURE ACT/REVIEW OR APPEAL OF AGENCY DECISION	
[] 230 RENT LEASE & EJECTMENT	[] 443 HOUSING/ACCOMMODATIONS	[] 550 CIVIL RIGHTS	APPLICATION		[] 950 CONSTITUTIONALITY OF STATE STATUTES	
[] 240 TORTS TO LAND	[] 445 AMERICANS WITH DISABILITIES - EMPLOYMENT	[] 555 PRISON CONDITION	[] 465 OTHER IMMIGRATION ACTIONS			
[] 245 TORT PRODUCT LIABILITY	[] 446 AMERICANS WITH DISABILITIES - OTHER	[] 560 CIVIL DETAINEE CONDITIONS OF CONFINEMENT				
[] 290 ALL OTHER REAL PROPERTY	[] 448 EDUCATION					

Check if demanded in complaint:

CHECK IF THIS IS A CLASS ACTION
UNDER F.R.C.P. 23

DO YOU CLAIM THIS CASE IS RELATED TO A CIVIL CASE NOW PENDING IN S.D.N.Y.
AS DEFINED BY LOCAL RULE FOR DIVISION OF BUSINESS 13?

IF SO, STATE:

DEMAND \$ 40,000,000 OTHER _____ JUDGE _____ DOCKET NUMBER _____

Check YES only if demanded in complaint
JURY DEMAND: YES NO

NOTE: You must also submit at the time of filing the Statement of Relatedness form (Form IH-32).

(PLACE AN X IN ONE BOX ONLY)

- | | | | | | | |
|-----------------------------------------------------------|-----------------------------------------------------|----------------------------------------------------------|---------------------------------------------------|----------------------------------------------------------------|-------------------------------------------------------------------|---------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from (Specify District) | <input type="checkbox"/> 6 Multidistrict Litigation (Transferred) | <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge |
| <input type="checkbox"/> a. all parties represented | | | | | | <input type="checkbox"/> 8 Multidistrict Litigation (Direct File) |
| <input type="checkbox"/> b. At least one party is pro se. | | | | | | |

(PLACE AN X IN ONE BOX ONLY)

- 1 U.S. PLAINTIFF 2 U.S. DEFENDANT 3 FEDERAL QUESTION 4 DIVERSITY
(U.S. NOT A PARTY)

IF DIVERSITY, INDICATE CITIZENSHIP BELOW.**CITIZENSHIP OF PRINCIPAL PARTIES (FOR DIVERSITY CASES ONLY)**

(Place an [X] in one box for Plaintiff and one box for Defendant)

CITIZEN OF THIS STATE	PTF [] 1	DEF [] 1	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY	PTF [] 3	DEF [] 3	INCORPORATED and PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE	PTF [] 5	DEF [] 5
CITIZEN OF ANOTHER STATE	<input checked="" type="checkbox"/> 2	<input type="checkbox"/> 2	INCORPORATED or PRINCIPAL PLACE OF BUSINESS IN THIS STATE	<input type="checkbox"/> 4	<input type="checkbox"/> 4	FOREIGN NATION	<input type="checkbox"/> 6	<input type="checkbox"/> 6

PLAINTIFF(S) ADDRESS(ES) AND COUNTY(IES)

CITGO Petroleum Corporation
1293 Eldridge Parkway
Houston TX 77077
Houston County

DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES)

Please see attached addendum.

DEFENDANT(S) ADDRESS UNKNOWN

REPRESENTATION IS HEREBY MADE THAT, AT THIS TIME, I HAVE BEEN UNABLE, WITH REASONABLE DILIGENCE, TO ASCERTAIN THE RESIDENCE ADDRESSES OF THE FOLLOWING DEFENDANTS:

COURTHOUSE ASSIGNMENT

I hereby certify that this case should be assigned to the courthouse indicated below pursuant to Local Rule for Division of Business 18, 20 or 21.

Check one: THIS ACTION SHOULD BE ASSIGNED TO: WHITE PLAINS MANHATTAN

DATE 1/15/2021



SIGNATURE OF ATTORNEY OF RECORD

RECEIPT #

ADMITTED TO PRACTICE IN THIS DISTRICT

[] NO

 YES (DATE ADMITTED Mo. April Yr. 2017)
Attorney Bar Code # JC0612

Magistrate Judge is to be designated by the Clerk of the Court.

Magistrate Judge _____ is so Designated.

Ruby J. Krajick, Clerk of Court by _____ Deputy Clerk, DATED _____.

UNITED STATES DISTRICT COURT (NEW YORK SOUTHERN)

Addendum to Civil Cover Sheet – Defendants’ Addresses

Ascot Underwriting Limited
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London EC3N 3AR
United Kingdom

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122 Leadenhall Street
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United Kingdom

Travelers Syndicate Management Limited
23-27 Alie Street
London, E1 8DS
United Kingdom

Brit Syndicates Limited
Leadenhall Building
122 Leadenhall Street
London EC3V 4AB
United Kingdom

Sompo International Insurance
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2 Minister Court, Mincing Lane
London EC3R 7BB
United Kingdom

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United Kingdom

Neon Underwriting Limited

20 Gracechurch Street
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82 Zollstrasse Schaan
Lichtenstein